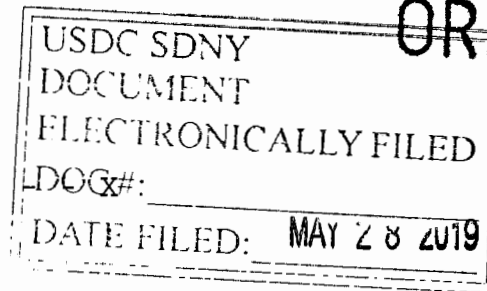


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



ORIGINAL

UNITED STATES OF AMERICA

- v. -

KONSTANTIN IGNATOV,

Defendant.

: SUPERSEDING  
: INFORMATION

: S7 17 Cr. 630 (ER)

:

X

COUNT ONE  
(Conspiracy to Commit Wire Fraud)

The United States Attorney charges:

1. From in or about 2014 through in or about March 2019, in the Southern District of New York and elsewhere, KONSTANTIN IGNATOV, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that KONSTANTIN IGNATOV, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings,

signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, IGNATOV and others made and caused to be made false statements and misrepresentations soliciting individuals throughout the world, including in the Southern District of New York, to invest in "OneCoin," a purported cryptocurrency, and instructed individuals to transmit investment funds to OneCoin depository accounts in order to purchase OneCoin packages, thereby causing individuals to send interstate and international wires representing their OneCoin investments.

(Title 18, United States Code, Section 1349.)

**FORFEITURE ALLEGATION**

3. As a result of committing the offense alleged in Count One of this Information, KONSTANTIN IGNATOV, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.


Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Sections 853; and  
Title 28, United States Code, Section 2461.)

  
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GEOFFREY S. BERMAN *in*  
United States Attorney  
Southern District of New York

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

KONSTANTIN IGNATOV,

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SUPERSEDING INFORMATION

S7 17 Cr. 630 (ER)

(18 U.S.C. § 1349)

GEOFFREY S. BERMAN

United States Attorney.

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5/28/19 DEF. IGNATOV per w/atty JEFFREY CATHAM  
RVA DAMAGE.  
DEPT LABOR INFORMED AND PERM NOT GRANT  
NEOS PTC SET FOR 6/6/19 BEFORE J. RANES  
T/E FROM 5/28/19 - 6/6/19.  
DEF. DETENTION.

COTJ, LRMJ